REMARKS/ARGUMENTS

The Applicants have amended claims 1, 3, 4, 8, 10, 23 and 24 and cancelled claims 2, 9 and 66-68. Claims 5, 6 and 69 were previously withdrawn from consideration. Claims 1, 3, 4, 7, 8 and 10-65 are pending after this amendment.

The Applicants submit that the amendments to claims 1, 3, 4, 8, 10, 23 and 24 are completely supported by the application as originally filed and add no new matter.

Claim Rejections – 35 U.S.C. § 112

The Office Action raises 35 U.S.C. § 112, second paragraph, in relation to claims 8 and 23. The Applicants have amended claim 8 to depend from claim 1 in its entirety and have amended claim 23 to depend from claim 19 rather than claim 9.

The Applicants respectfully submit that these amendments obviate the Examiner's rejections under 35 U.S.C. § 112, second paragraph.

Claim Rejections – 35 U.S.C. § 102

Claims 1, 7-8 and 11-65 and US Patent No. 6,187,380 (Hallman et al.)

The Examiner has raised Hallman et al. in relation to claims 1, 7-8, 11-17, 19 and 48-65 under 35 U.S.C. § 102(b). The Applicants submit that claims 1, 7-8, 11-17, 19 and 48-65 patentably distinguish Hallman et al.

Claim 1 (as amended) recites a method for making "a negative-working lithographic master for wet offset lithographic printing" which comprises the combination of "coating a layer of positive-working radiation-imageable medium onto a hydrophilic lithographic base," "forming a mask on a surface of said radiation-imageable medium ... to create masked areas and unmasked areas" and "without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas and to uncover said hydrophilic lithographic base in said unmasked areas." The Applicants submit that Hallman et al. fails to teach or suggest this combination of features.

Figures 2a and 2b of Hallman et al. show an imaging plate and a developed plate. Figures 2a and 2b show a photosensitive layer and a base, but neither these Figures nor the accompanying text at col. 10, line 59 to col. 11, line 27 teach or suggest the claim 1 feature of "coating a layer of positive-working radiation-imageable medium onto a hydrophilic lithographic base." Furthermore, the developed plate shown in Figure 2b depicts ink receptive (oleophilic) and ink repellent (oleophobic) areas, but neither Figure 2b nor the accompanying text at col. 10, line 59 to col. 11, line 27 teach or suggest the claim 1 feature of "exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas and to uncover said hydrophilic lithographic base in said unmasked areas." For these reasons, Figures 2a and 2b do not teach or suggest the features of claim 1.

Figures 3a, 3b and 3c of Hallman et al. respectively depict imaging a plate, exposing the imaged plate to UV radiation and a developed plate. Figures 3a, 3b and 3c show a photosensitive layer, a primer and a base, but neither these Figures nor the accompanying text at col. 12, lines 7-23 disclose or suggest the claim 1 feature of "coating a layer of positive-working radiation-imageable medium onto a hydrophilic lithographic base." In addition, the developed plate shown in Figure 3c depicts ink receptive (oleophilic) and ink repellent (oleophobic) areas, but neither Figure 3c nor the accompanying text at col. 12, lines 7-23 teach or suggest the claim 1 feature of "exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas and to uncover said hydrophilic lithographic base in said unmasked areas." Furthermore, Figure 3b and the accompanying text at col. 12, lines 7-23 describe a process where the printing plate is exposed to UV radiation to effect a chemical change in the unmasked areas of the photosensitive layer (i.e. to make the photosensitive material in the unmasked layer developable). In contrast, claim 1 (as amended) recites "without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas." Based on this reasoning, Figures 3a, 3b and 3c do not teach or suggest the features of claim 1.

Examples 5, 6, 28, 29, 32 and 33 of Hallman et al. do not disclose or suggest the combination of features recited in claim 1. Each of these examples describes a plate-making

process where prior to development, the plate is exposed to UV light to effect a chemical change in unmasked areas of a photosensitive plate coating (i.e. to make the photosensitive plate coating developable). According to these examples, development occurs only after UV radiation exposure. These examples teach directly away from the claim 1 feature of "without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas." Accordingly, Examples 5, 6, 28, 29, 32 and 33 of Hallman et al. fail to anticipate the features of claim 1. The Applicants submit that none of the other examples of Hallman et al. teach or suggest the features of claim 1.

Based on this reasoning, the Applicants submit that claim 1 patentably distinguishes Hallman et al. Claims 7-8, 11-17, 19 and 48-65 depend from claim 1 and are submitted to patentably distinguish Hallman et al. for at least this reason.

The Examiner has raised the combination of Hallman et al. and US Patent No. 6,461,417 (Mahotra et al.) and the combination of Hallman et al. and US Patent No. 6,143,061 (Evans et al.) in relation to claims 1, 7-8 and 11-65 under 35 U.S.C. § 103(a). The Applicants submit that claims 1, 7-8 and 11-65 patentably distinguish these combinations of references.

As discussed above, Hallman et al. fail to teach or suggest the claim 1 method for making "a negative-working lithographic master for wet offset lithographic printing" which comprises the combination of "coating a layer of positive-working radiation-imageable medium onto a hydrophilic lithographic base," "forming a mask on a surface of said radiation-imageable medium ... to create masked areas and unmasked areas" and "without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas and to uncover said hydrophilic lithographic base in said unmasked areas." Neither Mahotra et al. nor Evans et al. remedy this deficiency. More particularly, both Mahotra et al. and Evans et al. disclose various compositions of ink, but do not teach or suggest the claim 1 features of forming an imagewise mask on a coating of positive-working radiation-sensitive medium or developing the radiation-sensitive medium (prior to allowing the radiation-

sensitive medium to become exposed by radiation) to remove the radiation-sensitive medium from the unmasked areas, thereby uncovering a hydrophilic lithographic base.

Based on this reasoning, the Applicants submit that claim 1 patentably distinguishes the combination of Hallman et al. and Mahotra et al. and the combination of Hallman et al. and Evans et al. Claims 7-8 and 11-65 depend from claim 1 and are submitted to patentably distinguish these combinations of references for at least this reason.

Claims 1, 7-8, 11-17, and 48-65 and U.S. Patent No. 6,691,618 (Deutsch et al.)

The Examiner has raised Deutsch et al. in relation to claims 1, 7-8, 11-17 and 48-65 under 35 U.S.C. § 102(e). The Applicants submit that claims 1, 7-8, 11-17 and 48-65 patentably distinguish Deutsch et al.

As understood by the Applicants, Deutsch et al. disclose a process for imaging a lithographic printing plate having a presensitizing coating. An inkjet printer is used to apply imagewise micro drops of an insolubilizing solution that insolubilizes exposed areas of the coating. The latent image is then developed.

As disclosed at col. 4, line 58 to col. 5, line 15 and in examples 1-12, Deutsch et al. require that an insolubilizing chemical be imagewise applied to the presensitized coating of a printing plate using an inkjet printer. The insolubilizing chemical causes a chemical change in the imaged areas of the presensitized coating, rendering the coating insoluble (i.e. insolubilizing the coating) in these imaged areas. In direct contrast to Deutsch et al., claim 1 (as amended) relates to a method for making a negative-working lithographic master and recites "forming a mask on a surface of said radiation-imageable medium without substantially chemically altering said radiation-imageable medium ... to create masked areas and unmasked areas."

Based on this reasoning, the Applicants submit that claim 1 patentably distinguishes Deutsch et al. Claims 7-8, 11-17 and 48-65 depend from claim 1 and are submitted to patentably distinguish Deutsch et al. for at least this reason.

The Examiner has raised the combination of Deutsch et al. and Mahotra et al. and the combination of Deutsch et al. and Evans et al. in relation to claims 1, 7-8 and 11-65 under 35

U.S.C. §103(a). The Applicants submit that claims 1, 7-8 and 11-65 patentably distinguish these combinations of references.

As discussed above, Deutsch et al. fail to teach or suggest the claim 1 method for making a negative-working lithographic master which comprises "forming a mask on a surface of said radiation-imageable medium without substantially chemically altering said radiation-imageable medium ... to create masked areas and unmasked areas." Neither Mahotra et al. nor Evans et al. remedy this deficiency. More particularly, both Mahotra et al. and Evans et al. disclose various compositions of ink, but do not teach or suggest the claim 1 feature of forming an imagewise mask on a coating of positive-working radiation-sensitive medium without chemically altering the radiation-imageable medium.

Based on this reasoning, the Applicant submits that claim 1 patentably distinguishes the combination of Deutsch et al. and Mahotra et al. and the combination of Deutsch et al. and Evans et al. Claims 7-8 and 11-65 depend from claim 1 and are submitted to patentably distinguish these combinations of references for at least this reason.

Claim 3

The Office Action raises Hallman et al. in relation to claim 3 under 35 U.S.C. § 102(b). The Applicants submit that claim 3 patentably distinguishes Hallman et al.

Claim 3 (as amended) relates to a method for making a negative-working lithographic master for wet offset lithographic printing and recites the combination of "providing a lithographic precursor comprising a layer of positive-working radiation-imageable medium coated on a hydrophilic lithographic base," "forming a mask on a surface of said radiation-imageable medium ... to create masked and unmasked areas" and "without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, exposing said layer of radiation-imageable medium to said developer to remove said radiation-imageable medium from said unmasked areas and to uncover said hydrophilic lithographic base in said unmasked areas." As discussed above in relation to claim 1, Hallman et al. fail to disclose or suggest the claim 3 combination of providing a coating of positive-working radiation-imageable medium on a hydrophilic base, applying an image mask to the radiation-imageable medium and

developing the masked precursor to remove the radiation-imageable medium from, and to uncover the hydrophilic base in, the unmasked areas without allowing the radiation-imageable medium to become substantially exposed by ultraviolet radiation. Based on this reasoning, claim 3 is submitted to patentably distinguish Hallman et al.

The Office Action raises Hallman et al. in combination with Mahotra et al. and Hallman et al. in combination with Evans et al. in relation to claim 3 under 35 U.S.C. §103(a). Neither Mahotra et al. nor Evans et al. remedy the aforementioned deficiencies with Hallman et al. Accordingly, the Applicants submit that claim 3 patentably distinguishes the combination of Hallman et al. and Mahotra et al. and the combination of Hallman et al. and Evans et al.

The Office Action raises Deutsch et al. in relation to claim 3 under 35 U.S.C. §102(e). The Applicants submit that claim 3 patentably distinguishes Deutsch et al.

As discussed above in relation to claim 1, Deutsch et al. specifically require the imagewise application of an insolubilizing chemical to the presensitized coating of a printing plate to cause a chemical change in the imaged areas of the coating, rendering the coating insoluble in these imaged areas. In direct contrast, claim 3 (as amended) recites "forming a mask on a surface of said radiation-imageable medium without substantially chemically altering said radiation-imageable medium ... to create masked areas and unmasked areas." The Applicants submit that Deutsch et al. fail to teach or suggest this claim 3 feature and that claim 3 therefore patentably distinguishes Deutsch et al.

The Office Action raises Deutsch et al. in combination with Mahotra et al. and Deutsch et al. in combination with Evans et al. in relation to claim 3 under 35 U.S.C. §103(a). Neither Mahotra et al. nor Evans et al. remedy the aforementioned deficiencies with Deutsch et al. Accordingly, the Applicants submit that claim 3 patentably distinguishes the combination of Deutsch et al. and Mahotra et al. and the combination of Deutsch et al. and Evans et al.

Based on the reasoning presented above, the Applicants respectfully submit that claim 3 patentably distinguishes the prior art of record.

Claim 4

The Office Action raises Hallman et al. in relation to claim 4 under 35 U.S.C. §102(b). The Applicants submit that claim 4 patentably distinguishes Hallman et al.

Claim 4 (as amended) relates to a method for making a negative-working lithographic master from a positive-working radiation-imageable medium and recites the combination of "imagewise depositing droplets of a masking fluid onto a layer of positive-working radiation-imageable medium on a hydrophilic lithographic base without substantially chemically altering said radiation-imageable medium" and "without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, removing said radiation-imageable medium to uncover said hydrophilic base in regions where said masking fluid has not been applied by exposure of said radiation imageable medium to one or more developing chemicals." As discussed above in relation to claim 1, Hallman et al. fail to disclose or suggest the claim 4 combination of applying an image mask to a positive-working radiation-imageable medium coated on a hydrophilic lithographic base and developing the masked precursor to remove the radiation-imageable medium from, and to uncover the hydrophilic base in, the unmasked areas without allowing the radiation-imageable medium to become substantially exposed by ultraviolet radiation. Based on this reasoning, claim 4 is submitted to patentably distinguish Hallman et al.

The Office Action raises Hallman et al. in combination with Mahotra et al. and Hallman et al. in combination with Evans et al. in relation to claim 4 under 35 U.S.C. §103(a). Neither Mahotra et al. nor Evans et al. remedy the aforementioned deficiencies with Hallman et al. Accordingly, the Applicants submit that claim 4 patentably distinguishes the combination of Hallman et al. and Mahotra et al. and the combination of Hallman et al. and Evans et al.

The Office Action raises Deutsch et al. in relation to claim 4 under 35 U.S.C. §102(e). The Applicants submit that claim 4 patentably distinguishes Deutsch et al.

As discussed above in relation to claim 1, Deutsch et al. specifically require the imagewise application of an insolubilizing chemical to the presensitized coating of a printing plate to cause a chemical change in the imaged areas of the coating, rendering the coating insoluble in these imaged areas. In direct contrast, claim 4 (as amended) recites "imagewise depositing droplets of a masking fluid onto a layer of positive-working radiation-imageable

medium on a hydrophilic lithographic base without substantially chemically altering said radiation-imageable medium." The Applicants submit that Deutsch et al. fail to teach or suggest this claim 4 feature and that claim 4 therefore patentably distinguishes Deutsch et al.

The Office Action raises Deutsch et al. in combination with Mahotra et al. and Deutsch et al. in combination with Evans et al. in relation to claim 4 under 35 U.S.C. §103(a). Neither Mahotra et al. nor Evans et al. remedy the aforementioned deficiencies with Deutsch et al. Accordingly, the Applicants submit that claim 4 patentably distinguishes the combination of Deutsch et al. and Mahotra et al. and the combination of Deutsch et al. and Evans et al.

Based on the reasoning presented above, the Applicants respectfully submit that claim 4 patentably distinguishes the prior art of record.

Claim 10

The Office Action raises Hallman et al. in relation to claim 10 under 35 U.S.C. §102(b). The Applicants submit that claim 10 patentably distinguishes Hallman et al.

Claim 10 (as amended) recites a masked lithographic printing precursor comprising the combination of "a hydrophilic base," "a layer of positive-working radiation-imageable medium coated on said base" and "a mask formed upon the surface of said layer of radiation-imageable medium without substantially chemically altering said radiation-imageable medium, said mask being in the form of said image to create masked areas and unmasked areas and said mask substantially resistant to a developer; wherein said printing precursor is developable, without allowing said radiation-imageable medium to become substantially exposed by ultraviolet radiation, to remove said radiation-imageable material from said unmasked areas and to uncover said hydrophilic lithographic base in said unmasked areas. As discussed above in relation to claim 1, Hallman et al. fail to disclose or suggest the claim 10 combination of a coating of positive-working radiation-imageable medium on a hydrophilic base, a mask which is imagewise applied to the radiation-imageable medium, wherein the masked precursor is developable to remove the radiation-imageable medium from, and to uncover the hydrophilic base in, the unmasked areas without allowing the radiation-imageable medium to become substantially

exposed by ultraviolet radiation. Based on this reasoning, claim 10 is submitted to patentably distinguish Hallman et al.

The Office Action raises Hallman et al. in combination with Mahotra et al. and Hallman et al. in combination with Evans et al. in relation to claim 10 under 35 U.S.C. § 103(a). Neither Mahotra et al. nor Evans et al. remedy the aforementioned deficiencies with Hallman et al. Accordingly, the Applicants submit that claim 10 patentably distinguishes the combination of Hallman et al. and Mahotra et al. and the combination of Hallman et al. and Evans et al.

The Office Action raises Deutsch et al. in relation to claim 10 under 35 U.S.C. § 102(e). The Applicants submit that claim 10 patentably distinguishes Deutsch et al.

As discussed above in relation to claim 1, Deutsch et al. specifically require the imagewise application of an insolubilizing chemical to the presensitized coating of a printing plate to cause a chemical change in the imaged areas of the coating, rendering the coating insoluble in these imaged areas. In direct contrast, claim 10 (as amended) recites "a mask formed upon the surface of said layer of radiation-imageable medium without substantially chemically altering said radiation-imageable medium." The Applicants submit that Deutsch et al. fail to teach or suggest this claim 10 feature and that claim 10 therefore patentably distinguishes Deutsch et al.

The Office Action raises Deutsch et al. in combination with Mahotra et al. and Deutsch et al. in combination with Evans et al. in relation to claim 10 under 35 U.S.C. §103(a). Neither Mahotra et al. nor Evans et al. remedy the aforementioned deficiencies with Deutsch et al. Accordingly, the Applicants submit that claim 10 patentably distinguishes the combination of Deutsch et al. and Mahotra et al. and the combination of Deutsch et al. and Evans et al.

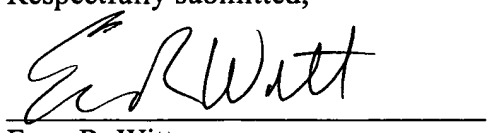
Based on the reasoning presented above, the Applicants respectfully submit that claim 10 patentably distinguishes the prior art of record.

Conclusions

In view of the amendments and arguments presented above, the Applicants submit that this application is in condition for allowance and respectfully request favorable reconsideration and allowance of this application. If there are any remaining issues preventing allowance of the

pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,



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